

# EXHIBIT A



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## Scott J. Witt, FSA, MAAA

### Expert Witness Qualifications – December 2018

- I have 23+ years of experience as an actuary in the insurance industry, including 10 working for Northwestern Mutual and 13+ years as a fee-only insurance advisor.
- I maintain the highest actuarial designations, FSA (Fellow of the Society of Actuaries) and MAAA (Member of the American Academy of Actuaries).
- I am a Financial Services Affiliate member of the National Association of Personal Financial Advisors (NAPFA).
- I have an M.S. in Statistics (Oregon State, 1994). I have a B.S. in Mathematics (Montana Tech, 1993) and a B.S. in Computer Science (Montana Tech, 1993).
- I am licensed to engage in the business of insurance in the state of Wisconsin, License Number 2510744.
- I have completed the Series 65 examination administered by FINRA (Financial Industry Regulatory Authority).
- I am a frequent speaker on the topic of life insurance.
- I am quoted frequently in local, regional, and national publications, including the *Wall Street Journal*, *Investment News*, *Investment Advisor*, *San Francisco Chronicle*, *InsWeb*, *Smart Money*, *Financial Advisor*, *Dow Jones*, *Chicago Tribune*, and *BizTimes*, among others.
- Here are the articles that I have had published in the last 10 years:
  - Variable Universal Life—Buyer Beware!, *The Insurance Forum*, November 2008
  - Risks of Borrowing From Your Life Insurance Policy, *BizTimes*, September 18, 2009
  - A Bear Market Bailout for the Life Insurance Industry, *The Insurance Forum*, November 2009



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- Here are the newsletters over the last 10 years that I have distributed:
  - Life Insurance in the Financial Crisis—Insolvency, *At Witt's End*, May 2009
  - Don't Trust and Verify—Fiduciary Responsibility, *At Witt's End*, June 2009
  - Cash Value Policyholders: Are You Living in Lake Wobegon?, *At Witt's End*, June 2011
  - Are You Unintentionally Boosting Insurance Company Profits?, *At Witt's End*, September 2013
  - When Does Fee-Only Insurance Advice Make Sense?, *At Witt's End*, April 2014
  - Complexity and Confusion – Don't Let Them Knock You Out!, *At Witt's End*, May 2014
  - Illustration Games: Unrealistic Mortality Rates, website commentary, September 2014
  - Illustration Games: Immortality Rates, website commentary, September 2014
  - Are Your Clients' Interests Aligned With Those of Their Insurance Company?, website commentary, September 2014
  - A Review of Recent Literature on Shadow or Captive Reinsurance Arrangements, website commentary, September 2014
  - The Myth of the Hot Shooting Hand Is No Myth After All!, website commentary, September 2015
- My website, [www.wittactuarialservices.com](http://www.wittactuarialservices.com), also contains numerous issue briefs and articles regarding various insurance-related topics.



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▪ Cases with Expert Testimony

- 2014, Gary L. Gregg and Mary E. Gregg, Husband and Wife, v. American Express Financial Corporation, American Express Financial Advisors Corporation, IDS Life Insurance Company and Robert A. Kovalchik, Case No. GD 01-006611, Court of Common Pleas, Allegheny County, Pennsylvania. Plaintiffs' expert. Case involved dispute over the purchase of a VUL policy in lieu of a survivor benefit option available to Plaintiffs.
- 2017, Barbara Larson, Individually and On Behalf of All Others Similarly Situated, Plaintiff, vs. John Hancock Life Insurance Company, Defendant, Case No. RG16813803, Superior Court for the State of California, County of Alameda. Plaintiff's expert. Case involved dispute over cost of insurance rates with respect to contractual language.
- 2017, Kerin K. Peterson, Petitioner and Scott W. Peterson, Respondent, Case No. 14-FA-567, State of Wisconsin, Circuit Court, Dane County. Respondent's expert. Case involved determining appraisal value for divorce proceedings.
- 2018, Michael Vogt, Individually and On Behalf of All Others Similar Situated, Plaintiff, vs. State Farm Life Insurance Company, Defendant, Case No. 2:16-cv-04170-NKL, U.S. District Court, Western District of Missouri, Central Division. Plaintiff's expert. Case involved dispute over cost of insurance rates with respect to contractual language.
- 2018, John J. and Bonnie L. Bernadowski v. Ameriprise Financial, Inc., Ameriprise Financial Services, Inc., RiverSource Life Insurance Co., and Daniel S. Henderson, Case No. GD 01-008101, Court of Common Pleas, Allegheny County, Pennsylvania. Plaintiffs' expert. Case involved dispute over the purchase of a variable annuity and surrounding marketing materials.
- 2018, Frederick D. Taylor, On Behalf of All Others Similar Situated, Plaintiff, vs. Midland National Life Insurance Company, Defendant, Case No. 4:16-cv-140-SMR-HCA, U.S. District Court, Southern District of Iowa, Central Division. Plaintiff's expert. Case involved dispute over risk rates with respect to contractual language.
- Have been hired multiple times as an expert for Plaintiffs and multiple times as an expert for Defendants in cases that were settled after the completion of my expert report and prior to my testimony.



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### **Compensation Arrangement**

- Hourly fee of \$450 except for sworn testimony (deposition or trial), which is \$550 per hour
- Reimbursement for travel expenses (plus travel time billed customarily at \$225 per hour unless other arrangements made)
- Outcome of case has no bearing on compensation

